

STATE OF SOUTH CAROLINA

(Caption of Case)

Rulemaking Regarding Prepaid
Telecommunications Local Services

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET
NUMBER: 2007 - 400 - C

(Please type or print)

Submitted by: John J. Pringle, Jr.

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NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition

☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input checked="" type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input checked="" type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other: _____	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

Print Form

Reset Form

ELLIS:LAWHORNE

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April 2, 2008

FILED ELECTRONICALLY

The Honorable Charles L.A. Terreni
Chief Clerk
South Carolina Public Service Commission
Post Office Drawer 11649
Columbia, South Carolina 29211

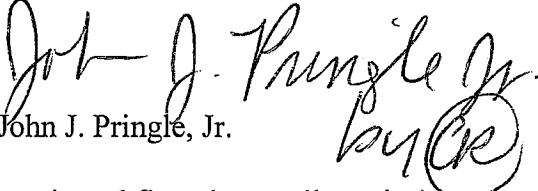
RE: Rulemaking Regarding Prepaid Telecommunications Local Services
Docket No. 2007-400-C

Dear Mr. Terreni:

Enclosed are the **Comments of Sprint Communications Company, L.P.** for filing in the above-referenced docket.

If you have any questions or need additional information, please do not hesitate to contact me.

Very truly yours,


John J. Pringle, Jr.

JJP/cr

cc: Nanette S. Edwards, Esquire (via electronic and first class mail service)
William R. Atkinson, Esquire (via electronic mail service)

Enclosure

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

In Re:

Rulemaking Regarding Prepaid
Telecommunications Local Services

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Docket No. 2007-400-C

COMMENTS OF SPRINT COMMUNICATIONS COMPANY L.P.

Pursuant to the directives contained in the Public Service Commission of South Carolina's ("Commission") Proposed Regulation filed with the South Carolina Legislative Council on February 8, 2008, Sprint Communications Company L.P. ("Sprint") now files its Comments regarding the Commission's proposed rules on the provision of prepaid regulated local exchange telephone service. Sprint wishes to clarify that the following remarks pertain only to regulated wireline local exchange service sold on a prepaid basis.

INTRODUCTION

Sprint is duly certificated to provide telecommunications services in South Carolina, including intrastate interexchange ("IXC") telecommunications service. As an IXC with an extensive coast-to-coast network, Sprint provides IXC services in all fifty states, and is interested in state Commission rules that facilitate the most efficient and effective provision of telecommunications services to all its customers. State Commission rules regarding the provision of prepaid regulated local telecommunications

services warrant particular attention from carriers providing services that prepaid local end-users may use or attempt to use in conjunction with their prepaid local service, since prepaid local service customers are generally not required to furnish a billing name or address to the prepaid local carrier.

COMMENTS

Sprint has no objection to the Commission's proposed rules as currently drafted, but because of the special circumstances involving prepaid regulated local service providers and their end-users, Sprint requests that the Commission consider adding a provision requiring prepaid local service providers to block end-user access to long-distance services. Based on Sprint's extensive history with providing IXC services nationwide, it has been Sprint's experience that prepaid local service providers typically do not advise the IXC that the prepaid provider has placed its end-user on the IXC's network. Under this scenario, the IXC does not receive end-user information to allow for the rendering of bills to the prepaid end-user. This is at least partially due to the fact that prepaid end-users are generally not required to provide a billing name or address to the prepaid local carrier.

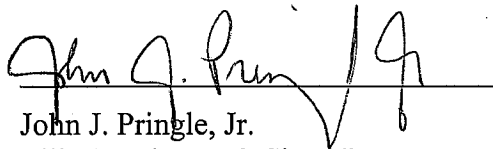
Accordingly, Sprint requests that a new subsection e. be added to the Commission's proposed regulation:

e. Blocking. Prepaid local service providers shall block end-user access to intrastate interexchange (IXC) service providers unless the end-user affirmatively demonstrates to the prepaid local provider that he or she has provided the IXC with a billing name and address and has established an account with the IXC.

CONCLUSION

In recognition of the foregoing, Sprint respectfully requests that the Commission adopt its recommendation in the above-styled docket.

Respectfully submitted this 2nd day of April, 2008.


A handwritten signature in black ink, appearing to read "John J. Pringle, Jr.", is written over a horizontal line.

John J. Pringle, Jr.
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Attorney for Sprint

Rulemaking Regarding Prepaid)
Telecommunications Local Services) Docket No. 2007-400-C

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Carol Roof
Paralegal

April 2, 2008
Columbia, South Carolina